



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
SARA JACQUELINE KING,  
  
Defendant.

No. 8:23-cr-00079-DOC

I N F O R M A T I O N

[18 U.S.C. § 1343: Wire Fraud;  
18 U.S.C. § 1957: Money  
Laundering; 18 U.S.C. § 982:  
Criminal Forfeiture]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant SARA JACQUELINE KING, an attorney licensed to practice law in California, operated King Family Lending LLC ("King Lending") in Newport Beach, California.

1           2.     King Lending purportedly provided short-term, high-  
2 interest loans to celebrities, professional athletes, and other  
3 high-net-worth individuals secured by the borrower's own assets,  
4 including designer handbags, watches, luxury automobiles,  
5 yachts, and earnings from guaranteed professional sports  
6 contracts (collectively the "loans").

7     B.     THE SCHEME TO DEFRAUD

8           3.     Beginning in or around January 2022 and continuing  
9 until at least in or around January 11, 2023, in Orange County,  
10 within the Central District of California, and elsewhere,  
11 defendant KING, knowingly and with intent to defraud, devised,  
12 participated in, and executed a scheme to obtain money and  
13 property from investors of King Lending by means of material  
14 false and fraudulent pretenses, representations, and promises,  
15 and the concealment of material facts.

16           4.     The fraudulent scheme operated, in substance, as  
17 follows:

18                 a.     Defendant KING, through King Lending, recruited  
19 investors to purportedly fund the loans.

20                 b.     Defendant KING told investors that their  
21 investments were secured by the same collateral as the loans.

22                 c.     Defendant KING promised that she would retain  
23 possession of the collateral, and in the event a borrower  
24 defaulted, defendant KING would sell the collateral and pay the  
25 investor in full.

26                 d.     Defendant KING represented that she would keep a  
27 percentage of the interest earned from the loan for herself and  
28

1 would pass along a percentage of the interest to the investor,  
2 along with the investor's initial investment.

3 e. In reality, during this time period, defendant  
4 KING never initiated nor funded any loan. Instead of using the  
5 investor funds for loans, defendant KING used the funds to  
6 gamble at Las Vegas casinos and support her lavish lifestyle.

7 5. Based on the fraudulent scheme above, defendant KING  
8 caused five investors to lose more than \$8 million.

9 B. THE USE OF AN INTERSTATE WIRE

10 6. On or about August 4, 2022, in Orange County, within  
11 the Central District of California, and elsewhere, for the  
12 purpose of executing the above-described scheme to defraud,  
13 defendant KING caused the transmission of \$99,980 from investor  
14 L.R. through the Clearing House Interbank Payments System to  
15 King Lending's JP Morgan bank account located in Newport Beach,  
16 California to fund a purported loan.

COUNT TWO

[18 U.S.C. § 1957]

7. On or about June 27, 2022, in Orange County, within the Central District of California, and elsewhere, defendant SARA JACQUELINE KING knowingly engaged in a monetary transaction of a value greater than \$10,000, involving funds that she knew to be criminally derived property, and which property, in fact, was derived from specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, specifically, a \$132,156.09 withdrawal from King Lending's JP Morgan bank account to purchase a Porsche Taycan.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 982]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(2), in the event of the defendant's conviction of the offense set forth in Count One of this Information.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), the defendant, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished

1 in value; or (e) has been commingled with other property that  
2 cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 982]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(1), in the event of the defendant's conviction of the offense set forth in Count Two of this Information.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

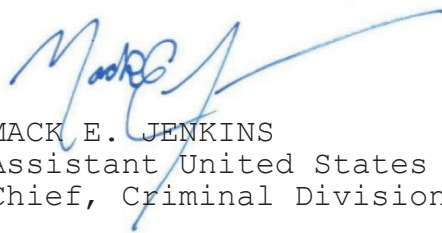
(a) Any property, real or personal, involved in such offense, and any property traceable to such property; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 18, United States Code, Section 982(b)(2), the defendant, if so convicted, shall forfeit substitute property, if, by any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty. Substitution of assets shall not be ordered, however, where the convicted defendant acted merely as

1 an intermediary who handled but did not retain the property in  
2 the course of the money laundering offense unless the defendant,  
3 in committing the offense or offenses giving rise to the  
4 forfeiture, conducted three or more separate transactions  
5 involving a total of \$100,000 or more in any twelve-month  
6 period.

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